

**LAW OFFICES OF
WONG, WONG & ASSOCIATES, P.C.**

RAYMOND H. WONG *
VALERIE Y. C. WONG *

150 BROADWAY, SUITE 1588
NEW YORK, NY 10038
PHONE: (212) 566-8080
FACSIMILE: (212) 566-8960

NEW JERSEY OFFICE
12 ROSZEL RD, STE A102
PRINCETON, NJ 08540
PHONE: (609) 520-1668
FACSIMILE: (609) 520-1168

PAUL ANDERSON GILMER *
NATALYA RUTCHYK *
VICKY C. MAO ‡
DOUGLAS DOOLING, JR. °
PETER E. SOCKLER, JR. #
YAEL KLAUSNER *

* MEMBER NY & NJ BARS
‡ MEMBER NY BAR
MEMBER NJ BAR
° MEMBER NY, NJ, MA & DC BARS

VIA ECF

The Honorable Gregory H. Woods, U.S.D.J.
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St., Courtroom 12C
New York, NY 10007-1312

February 26, 2021

Re: **Request for an Extension of Time**
Zhang et al v. Han et al.
Case No. 1:21-cv-01625-GHW

Dear Judge Woods:

I have received the Court's order [Document 8] denying the Plaintiffs' application for an ex parte temporary restraining order. The order also directs Plaintiffs' counsel to serve a copy of this order and the Plaintiffs' application on Defendants no later than February 26, 2021.

On my firm's behalf, I seek clarification regarding whether service by mail of the order and accompanying documents is considered sufficient, or for an extension of time to serve copies of your order and the Plaintiffs' application on the Defendants. My firm will not be able to personally serve all of the Defendants a copy of the summons and complaint pursuant to Rule 4 within the time set by the Court's order by the end of today, but we will be able to mail a copy of the order [Document 8] and accompanying documents by the end of the day pursuant to Rule 5. While most Defendants have addresses in the City of New York, two Defendants have addresses in the British Virgin Islands, two Defendants have addresses in the Cayman Islands, one

Defendant has an address in Hong Kong S.A.R., and two Defendants have an address in the People's Republic of China. Plaintiffs will probably need to move for alternative forms of service of the summons and complaint in foreign countries given the difficulties with both the Hague Convention and local COVID restrictions. Therefore, Plaintiffs petition the Court for either an extension of time to serve copies of the order [Document 8] and of the Plaintiffs' application to Defendants or a clarification as to whether service of the order [Document 8] and accompanying materials via mail would be considered sufficient to comply with the service requirements of the order.

Finally, in the event an extension is granted, we seek to only have an extension of service until March 5, 2021 at this time, so that the date by which service must be rendered will still be at least fourteen (14) days before the return date of March 19, 2021, which we do not wish to have delay.

Respectfully Submitted,

/s/ Paul Gilmer

Paul Gilmer, Esq.
WONG, WONG & ASSOCIATES, P.C.
Attorneys for Plaintiffs
pgilmer@wongwonglaw.com